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Attorneys for Defendant
WINNEBAGO INDUSTRIES, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

ALFRED SIMS,

Plaintiff,

v.

WINNEBAGO INDUSTRIES, INC.;
and DOES 1 to 10, inclusive

Defendant.

Case No.: 2:23-cv-00686-JAM-JDP

[Solano County Court Case No.
FCS059753]

Complaint Filed: March 1, 2023
Trial Date: Not Yet Set

STIPULATION RE VDRP DEADLINE

Judge: Hon. John A. Mendez
Ctrm: 6

TO THE HONORABLE COURT:

Plaintiff Alfred Sims (“Plaintiff” or “Sims”) and Defendant Winnebago Industries, Inc. (“Defendant” or “Winnebago”) (hereinafter referred to as the “Parties”), by and through their respective counsel, hereby stipulate as follows:

1. On May 17, 2023, this matter was referred to this Court’s Voluntary Dispute Resolution Program (“VDRP”). *See* ECF No. 11.

2. On May 18, 2023, this Court provided a database of available VDRP neutrals to mediate this case. After meeting and conferring regarding the available neutrals, the Parties agreed on neutral Karen Jacobsen.

3. Pursuant to Local Rule 271, the Parties have 91 days to complete mediation.

The Parties hereby request an additional 60 days to complete mediation. Good cause exists to grant this request:

4. Plaintiff’s counsel, Adam Carlson, will be on paternity leave from June 19, 2023 to July 7, 2023.

5. Additionally, Defense counsel, Dillon D. Chen, will be on maternity leave starting June 12, 2023. Defendant will be represented by another associate, Gina Kripotos, who will need time to become acquainted with this matter.

6. Based on the Parties’ counsel upcoming unavailability, the Parties have agreed that an additional 60 days is necessary to prepare for and complete mediation in this action.

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1 For these reasons, the Parties ask this Court to extend the deadline to complete
2 VDRP mediation by 60 days, to October 23, 2023.

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4 Respectfully submitted,

5 Dated: June 6, 2023

DINSMORE & SHOHL LLP

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7 By: /s/ Dillon D. Chen

DILLON D. CHEN

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9 Attorneys for Defendant
WINNEBAGO INDUSTRIES, INC.

10 Dated: June 6, 2023

CASPER, MEADOWS, SCHWARTZ & COOK

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12 By: /s/ Adam Carlson (as authorized on 06.06.23)

13 ADAM CARLSON

14 Attorneys for Plaintiff
15 ALFRED SIMS

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18 **ATTESTATION**

19
20 I attest that I received permission from Adam Carlson on June 6, 2023 at 1:21
21 pm via email to affix his signature on this Stipulation re VDRP Deadline.

22 Executed on June 6, 2023 at San Diego, California

23
24 /s/ Dillon D. Chen

Dillon D. Chen

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on June 6, 2023, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per L.R. 135. Any party or counsel of record who have not consented to electronic service through the Court's CM/ECF system will be served by electronic mail, first class mail, and/or overnight delivery.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on June 6, 2023 at San Diego, California

/s/ Dillon D. Chen

Dillon D. Chen

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION**

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Plaintiff,

v.

WINNEBAGO INDUSTRIES, INC.; and
DOES 1 to 10, inclusive

Defendant.

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**ORDER GRANTING STIPULATION
RE VDRP DEADLINE**

Judge: Hon. John A. Mendez

Ctrm: 6

1 The Court, having reviewed the Stipulation submitted by the Parties, and finding
2 good cause, hereby **ORDERS** as follows:

3 The deadline for the Parties to complete VDRP mediation shall be **EXTENDED**
4 by 60 days, to **October 23, 2023**.

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6 **IT IS SO ORDERED.**

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8 Dated: June 07, 2023

/s/ John A. Mendez

9 THE HONORABLE JOHN A. MENDEZ

10 SENIOR UNITED STATES DISTRICT JUDGE
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